

O'CONNOR BERMAN DOTTS & BANES
Second Floor, Nauru Building
1 Nauru Loop
Susupe, Saipan, CNMI
Mail: PO Box 50-1969 Saipan MP 96950
Phone: 234-5684
Fax: 234-5683

Attorneys for Plaintiff

**IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

QIAN XIAOLI,

Plaintiff,

vs.

GRACE INTERNATIONAL, INC.,

Defendant.

Civ. No. 07-0017

**MOTION FOR ORDER
IN AID OF JUDGMENT**

Plaintiff Qian Xiaoli hereby moves the Court, pursuant to Rule 69 of the Federal Rules of Civil Procedure, for issuance of writ of execution or other order in aid of the judgment rendered in her favor in this matter. In support of this motion, Plaintiff shows the Court the following:

1. On December 17, 2007, supplemented on January 2, 2008, the Court entered a judgment in Plaintiff's favor in this matter in the total amount of \$78,103.87.

2. Defendant has closed its operations on Saipan, defaulted in this matter, and has not paid the judgment amount, or any of it.

3. Defendant remains in possession of a leasehold interest in its factory site on Texas Road, Susupe, Saipan, CNMI, and any and all chattels remaining within the factory and appurtenant buildings. See Ground Leases attached hereto as Exhibits A and B.

4. Defendant also possesses a chose in action against the United States for the recovery of

1 Social Security taxes wrongfully assessed and erroneously paid. Numerous other Saipan garment
2 factories, but not Defendant, have recently asserted such a claim in United States Court of Federal
3 Claims. See *Hyunjin (Saipan) Corporation, et al. v. United States*, U.S. Ct. Fed. Cl. No. 08-270 T
4 (complaint attached as Exhibit C).

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6 5. Plaintiff therefore moves the Court for its Order in aid of judgment, transferring title to
7 Grace's leasehold property to Plaintiff, and /or transferring to Plaintiff all of Grace's rights to
8 demand and recover from the United States any Social Security taxes wrongfully or erroneously paid
9 by Grace, in satisfaction of Plaintiff's judgment against Grace.

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11 Respectfully submitted this 30th day of May, 2008.

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13 O'CONNOR BERMAN DOTTS & BANES
14 Attorneys for Plaintiff

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16 By: _____/s/_____
17 Joseph E. Horey

18 3232-01-080516-M for order in aid.wpd
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